

1 **A. I believe they're paper. I'm not**
 2 **positive.**

3 Q. Would those payroll sheets typically
 4 include a report by the driver of any problems he had
 5 encountered on that particular day, in terms of
 6 problems with his truck or traffic accidents or any
 7 other items that interfered with his work?

8 **A. Okay, you're going to have to rephrase it.**

9 **Are you talking the truck per se, or if he had any**
 10 **delays, or what are you looking for?**

11 Q. I'm really trying get an understanding --

12 **A. You're fishing, I know.**

13 Q. I'm trying to get an understanding for
 14 what kind of information would be in those payroll
 15 sheets?

16 **A. Payroll sheet, I would imagine the load**
 17 **the driver has done. As far as the -- there is a**
 18 **trip ticket on the truck that would -- if there was**
 19 **any problem with the truck, the driver would write it**
 20 **down. It's called a pre-trip inspection, required by**
 21 **law.**

22 Q. And is a pre-trip inspection report
 23 completed by a driver for every shift he works?

24 **A. Yes.**

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1 Q. And where does Trans-Spec keep the
 2 pre-trip inspection reports?

3 **A. I believe at 22 Eskow Road.**

4 Q. Are they in that office trailer,
 5 so-called?

6 **A. Some of them could be.**

7 Q. Do you know whether they are kept separate
 8 from the repair orders?

9 **A. I have no idea.**

10 Q. But there should be a pre-trip inspection
 11 report basically for each driver for each of these
 12 trucks for each of the days that the trucks were
 13 operated in Trans-Spec's business?

14 **A. Correct.**

15 Q. If a driver encounters some delay in the
 16 course of his work, you know, if the Mass Pike is
 17 backed up because of construction, or if there's a
 18 snowstorm, or if some unforeseen event occurs that
 19 bears upon what that driver was able to accomplish
 20 that day, is there a document where the driver would
 21 report that type of occurrence?

22 **A. He would physically report that on his**
 23 **Nextel phone to the dispatchers, who would make a**
 24 **note of it, I believe.**

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1 Q. So the driver would not fill out a
 2 document, but the dispatch report would have a
 3 reference to Joe Blow was delayed on the Pike because
 4 of construction or something?

5 **A. It might and it might not. It depends on**
 6 **how thorough the dispatcher is.**

7 Q. Understood. But if a communication of
 8 that type were to be recorded, the place it would be
 9 recorded would be on one of these dispatch sheets?

10 **A. I would imagine, yes.**

11 Q. And you wouldn't expect it to be recorded
 12 anywhere else?

13 **A. No, I wouldn't.**

14 Q. Since you have been at Trans-Spec, have
 15 any of the Sterling trucks involved in this case been
 16 involved in any motor vehicle accidents?

17 **A. Say that again now.**

18 Q. Since you've been at Trans-Spec starting
 19 in October 2003, have any of the 22 Sterling trucks
 20 involved in this case been involved in any traffic
 21 accidents?

22 **A. Probably.**

23 Q. Have any of those traffic accidents caused
 24 any of the trucks to be out of service?

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2 Q. Which truck or trucks have been out of
 3 service as a result of traffic accidents during your
 4 tenure at Trans-Spec?

5 **A. Tractor 8000.**

6 Q. And when was it out of service?

7 **A. I don't know exactly. It was during the**
 8 **winter months. It went up on about 90 feet of**
 9 **guardrail on the Mass Pike in Palmer, Mass.**

10 Q. Did it roll over?

11 **A. No.**

12 Q. How long was it out of service?

13 **A. Probably a week and a half, two weeks**
 14 **maybe, if that.**

15 Q. Do you recall any of the other Sterling
 16 trucks involved in this case being involved in
 17 traffic accidents that resulted in them being out of
 18 service for some period of time?

19 **A. Yeah, there was one that was in an**
 20 **accident about two weeks ago that the nose -- that's**
 21 **still out of service.**

22 Q. Which one was that?

23 **A. I don't honestly know which number it is.**

24 Q. It's been out of service for a week or two
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